

DAVID J. GRECH  
[DGRECH@GRSM.COM](mailto:DGRECH@GRSM.COM)

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER™**

**MEMO ENDORSED**

ATTORNEYS AT LAW  
1 BATTERY PARK PLAZA  
28TH FLOOR  
NEW YORK, NY 10004  
PHONE: (212) 269-5500  
FAX: (212) 269-5505  
[WWW.GRSM.COM](http://WWW.GRSM.COM)

April 29, 2022

**VIA ECF**

The Honorable Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Contreras v. SureFire, LLC*  
Case No. 1:22-cv-00009-KPF

Dear Judge Failla:

We represent defendant SureFire, LLC in this website accessibility case brought by plaintiff Yensy Contreras, and we write, pursuant to Rule 2.D. of Your Honor's Individual Rules of Practice in Civil Cases and with Plaintiff's consent, to respectfully request an extension of time for SureFire to answer, move, or otherwise respond to the Complaint.

We respectfully submit that an extension of thirty (30) days to June 1, 2022 for SureFire to respond to the Complaint is warranted to allow additional time for the parties to continue their negotiations toward an amicable resolution that would obviate the need for further intervention by the Court. Those negotiations are ongoing, including as recently as today, and the parties continue to make progress. This represents SureFire's fourth request for an extension of time to respond to the Complaint. The previous requests, also upon consent, were granted by the Court. As this requested extension would affect another scheduled date, specifically May 24, 2022 for the initial pretrial conference with the Court, we respectfully and with Plaintiff's consent also request an attendant adjournment of the initial pretrial conference for approximately thirty (30) days, subject to the Court's calendar. This represents the second request for an adjournment of the initial pretrial conference.



Hon. Katherine Polk Failla, U.S.D.J.  
U.S. District Court, S.D.N.Y.  
April 29, 2022  
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We appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully Submitted,

GORDON REES  
SCULLY MANSUKHANI, LLP

/s/ David J. Grech  
David J. Grech

To: All counsel of record (via ECF)  
Cc: Chambers (via email)

Application GRANTED. Defendant's deadline to answer, move, or otherwise respond to the Complaint is hereby extended to **June 1, 2022**. The initial pretrial conference scheduled for May 24, 2022, is hereby ADJOURNED to **June 24, 2022, at 2:30 p.m.** As this is the parties' fourth request for an extension, the Court will not grant further extensions.

The Clerk of Court is directed to terminate the pending motion at docket number 15.

Dated: May 2, 2022  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE